

AWMD / WEMM

JUN 21 2010

RECEIVED

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: CLINTON INC.
ADDRESS: 2005 S. 19TH STREET
CLINTON IA 52732
EPA ID NUMBER: 1AD047303771 DATE: 6/2/10

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

- ✓ 1. FAILURE TO LABEL ^{STORAGE} CONTAINERS OF USED OIL AS
"USED OIL" (40 CFR 279.22(XI))
- ✓ 2. FAILURE TO LABEL UNIVERSAL WASTE LAMPS AS "USED LAMPS,"
"UNIVERSAL WASTE LAMPS," "WASTE LAMPS" (40 CFR 273.14(e))
- ✓ 3. FAILURE TO DATE UNIVERSAL WASTE LAMPS (40 CFR 273.15(i))
- ✓ 4. FAILURE TO TRAIN EMPLOYEES IN MGMT OF UNIVERSAL
WASTE (40 CFR 273.16)
- ✓ 5. FAILURE TO LABEL FILTER PRESS SATELLITE ACCUMULATION
CONTAINER (40 CFR 262.34(XI))
- ✓ 6. FAILURE TO LABEL SIX CONTAINERS OF OLD PROCESS
CHEMICALS (40 CFR 262.34(a)(3))
- ✓ 7. FAILURE TO DATE 16 CONTAINERS OF OLD PROCESS
CHEMICALS (40 CFR 262.34(a)(2))

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: MARK J. STEELE TITLE: EPA/OSHA COMPLIANCE MGR

SIGNATURE: *Mark J. Steele*

This document was prepared by HEATHER K. WOOD

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RCRA

NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: CLINTON INC.
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- ✓ 8) STORAGE OF HAZARDOUS WASTE LONGER THAN 90 DAYS WITHOUT A PERMIT AS REQUIRED BY RCRA SECTION 3005
- ✓ 9) FAILURE TO MAKE A WASTE DETERMINATION ON DRUMMED CHEMICALS NENE USED OIL (40 CFR 262.11)
- ✓ 10) FAILURE TO INSPECT FILTER BLDG CONTAINER STORAGE AREA (40 CFR 262.34(a)(1)(i) → 265.174)
- ✓ 11) FAILURE TO TRAIN EMPLOYEES ANNUALLY (40 CFR 262.34(a)(4) → 265.16(c))
- 12) FAILURE TO TRAIN EMPLOYEES TO ENSURE COMPLIANCE WITH HAZARDOUS WASTE REGULATIONS (40 CFR 262.34(a)(4) → 265.16(a)(1))
- ✓ 13) FAILURE TO MAINTAIN HOME CONTACT INFO FOR EMERGENCY COORDINATORS IN CONTINGENCY PLAN (40 CFR 262.34(a)(4) → 265.52(L))
- ✓ 14) FAILURE TO MAINTAIN LIST OF RESPONSE EQUIPMENT IN EMERGENCY PLAN (40 CFR 262.34(a)(4) → 265.52(P))
- ✓ 15) FAILURE TO MAINTAIN A SPILL KIT FOR FILTER BLDG CONTAINER STORAGE AREA (40 CFR 262.34(a)(4) → 265.32(c))
- ✓ 16) CONTAINER NOT MANAGED WITH ADEQUATE AISLE SPACE AT FILTER BLDG CSA (40 CFR 262.34(a)(4) → 265.35)

INITIALS OF RECIPIENT: mya

INITIALS OF PREPARER: HKW